



**National Park Service
U.S. Department of the Interior**

Timucuan Ecological and Historic Preserve

**FINDING OF NO SIGNIFICANT IMPACT AND DECISION RECORD
FORT CAROLINE
NATIONAL MEMORIAL RELOCATION
ENVIRONMENTAL ASSESSMENT
PEPC 118467**

Recommended:

Chris Hughes,
Superintendent, Timucuan Ecological and Historic Preserve

Date

Approved:

Darrell L. Echols
Acting Regional Director, Interior Region 2

Date

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INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an environmental assessment (EA) to examine alternatives and environmental impacts associated with the proposed relocation of the Fort Caroline Memorial Exhibit (the exhibit) to address frequent flooding concerns from increasing tidal influences. The project is needed to address visitor safety and feasibility of future maintenance.^{1,2}

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION

The National Park Service analyzed two alternatives in the EA—alternative A (the no-action alternative) and alternative B (the preferred alternative / proposed action). Based on the analysis presented in chapter 3 of the EA, the National Park Service selected alternative B, the preferred alternative / proposed action, to relocate the exhibit. Under this alternative, the National Park Service will relocate the exhibit to an upland location out of the floodplain with views to the old exhibit location as well as the St. Johns River. The new location will also be closer to the Timucuan Preserve Visitor Center and will incorporate new accessible pathways.

The new exhibit will be constructed with a larger, more historically accurate footprint and will use the best available information gleaned from historical research to determine and reference key characteristics of the original Fort Caroline. The new exhibit will not attempt to recreate a replica of the original structure. Rather, selective portions of the footprint will be built to serve as a framework for understanding the physical scale and landscape of the original fort.

Use of and visitor access to the existing exhibit will be discontinued due to ongoing and increasing environmental impacts, largely caused by movement of the St. Johns River. Items of the existing exhibit deemed to be of significance, such as the arched entry gate, will be salvaged and incorporated into the design for the new memorial exhibit. Environmentally harmful materials present in the old exhibit will be removed and appropriately disposed of. The location will be graded to natural contours, the moat filled, and the area allowed to naturally revegetate

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1. Certification related to page limits: The National Park Service certifies it has considered the factors mandated by NEPA; that this FONSI represents its good-faith effort to prioritize documentation of the most important considerations required by the statute within the congressionally mandated page limits; that this prioritization reflects the National Park Service's expert judgement; and that any considerations addressed briefly or left unaddressed were, in the National Park Service's judgement, comparatively not of a substantive nature that meaningfully informed the consideration of environmental effects and the resulting decision on how to proceed.
 2. Certification related to deadline: The National Park Service certifies that this FONSI represents a good-faith effort to fulfill NEPA's requirements within the congressional timeline; that such effort is substantially complete; that, in the National Park Service's expert opinion, it has thoroughly considered the factors mandated by NEPA; and that, in the National Park Service's judgment, the analysis contained therein is adequate to inform and reasonably explain its decision regarding the proposed federal action.

and return to shoreline/wetland habitat with proper monitoring and control of invasive plants. The existing riprap along the riverbank will remain in place for continued protection of the site from wave action.

See chapter 2 of the EA (pages 10–17) for more details.

Rationale for the Decision

The proposed action was selected because it best meets the project purpose and need and will effectively:

- mitigate damages from Hurricane Ian and address increased tidal flooding;
- protect visitor resources and improve flood protection, stormwater management, and resiliency of the fort exhibits;
- allow the preserve to sustainably and cost effectively maintain the exhibit; and
- increase visitor engagement through incorporation of more accessible trails, interpretative education, and gathering spaces.

MITIGATION MEASURES

The National Park Service places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. Therefore, the National Park Service will implement resource protection measures and best management practices to protect the natural and cultural resources that the project could affect. The selected action incorporates by reference the resource protection measures listed in chapter 2 of the EA (pages 10–17) and presented in this document as attachment B. The National Park Service’s ability to mitigate impacts comes from the National Historic Preservation Act (NHPA) and the Organic Act of 1916 (39 Stat. 535; 16 U.S.C. 1, 2, 3, and 4). Mitigation measures for the adverse effect on the historic district, historic buildings and structures, cultural landscapes, and archeological resources under section 106 of the NHPA have been defined in a memorandum of agreement (MOA) between the National Park Service and the Florida Division of Historical Resources that resolves any adverse effects to cultural resources (attachment D).

OTHER ALTERNATIVES CONSIDERED

In addition to the selected alternative, the EA analyzed a no-action alternative. The no-action alternative was considered but ultimately not selected because the current conditions would remain, which would not address the purpose and need of this project to mitigate damages from Hurricane Ian and address the increased tidal flooding and storm damage.

SIGNIFICANCE CRITERIA REVIEW

Potentially Affected Environment

Fort Caroline National Memorial was established to commemorate the French settlers who attempted to establish a colony in Florida in the 1560s. As the exact location of the original fort has never been uncovered, the existing exhibit is not tied to a specific location but rather to the known elements of proximity to the St. Johns River and Atlantic Ocean. Current visitor and interpretive services are provided at the Timucuan Preserve Visitor Center, located within the memorial. As visitors stop at the visitor center, they can take a short walk to visit the exhibit. From the exhibit, visitors can experience expansive views of the memorial and St. Johns River.

To evaluate the potential for significant impacts, the National Park Service considers the setting, or potentially affected environment, in which impacts may occur. In this case, the selected alternative may beneficially or adversely impact cultural resources, visitor use and experience, and vegetation.

Please refer to the “Degree of Effect of the Action” section below for a more detailed description of the potential effects of the selected alternative on each of the resources discussed in the potentially affected environment.

Degree of Effect of the Action

The National Park Service considered the following actual or potential project effects in evaluating the degree of effects for the selected alternative.

Beneficial and Adverse, and Short-Term and Long-Term Effects of the Selected Alternative

No significant impacts on resources were identified in the EA that would require analysis in an environmental impact statement (EIS). Whether considered individually or as a whole, the impacts of the selected alternative, including direct and indirect impacts, do not reach the level of a significant effect because most adverse impacts associated with implementation will be minimal or temporary, lasting only as long as actions are being executed. The selected alternative will result in long-term but mitigatable impacts on cultural resources, substantial beneficial impacts on visitor use and experience, and negligible impacts on vegetation. Best management practices and mitigation measures as mentioned above (and described in detail in attachment B in this document) will further minimize any potential adverse impacts.

Cultural Resources

For the selected alternative, all features will be removed from the current exhibit. Items deemed to be of significance, such as the arched entry gate, will be salvaged and incorporated into the new exhibit. The site will be graded to approximate the natural terrain, the moat filled, and the area left to reclaim naturally with appropriate invasive plant control. Educational waysides and information about the removed exhibit will be included in the landscape.

The new exhibit site is located further upland, well above the floodplain, eliminating flooding as a long-term concern. The new location will incorporate accessible trails from the visitor center,

allowing access to a wider range of visitors. The new exhibit will use the best available historic research to determine and recall key characteristics of the original Fort Caroline but will not attempt to recreate a simulation of the original structure. It will selectively build out smaller portions of the footprint to serve as interpretive features to help visitors understand and visualize the French colonial experience. The forms and materials will be designed to ensure it is not mistaken as historical artifact or an attempt at recreation.

The loss of the existing exhibit will have a long-term adverse impact on the National Register of Historic Places (NRHP) historic district due to the loss of one of the four contributing structures. The loss of the existing exhibit will also be a long-term adverse impact due to the loss of the NRHP-eligible structure, which is significant in the area of commemoration (criteria consideration F) and which became eligible based on its Mission 66-era context; this would constitute an adverse effect according to 36 CFR 800.5.

The cultural landscape of the memorial is not defined only by the exhibit itself but also by the natural and humanmade landforms, vegetation, paths, and shoreline that have shaped the site over time. The exhibit, as an element of the landscape, plays a key role in maintaining the site's relationship with its environment and in providing visitors an interpretive experience into the French colonial history of the area. As a contributing element to an NRHP-eligible cultural landscape, removal of the exhibit will constitute an adverse effect under section 106 of the NHPA, according to 36 CFR 800.5, due to the loss of the landscape feature and changes to the associated circulation through the commemorative and educational memorial site. In addition, the construction of the new fort exhibit in an upland location near the Visitor Center will adversely impact the original Mission 66-era landscape's deliberate visitor progression from the centerpiece visitor center to the exhibit.

Although the proposed location for the new fort exhibit would maintain a similar relative position south of the St. Johns River adjacent to St. Johns Bluff, it would be located 14 feet above sea level and removed from the riverbank. Views from the exhibit location to the St. Johns River, critical to the interpretation and educational use of the exhibit, will be impacted by the relocation, although the impact on views to the river will be mitigated somewhat by clearing underbrush within its coastal hammock setting.

Removal of the existing fort exhibit will have long-term adverse impacts on the NRHP-listed historic district, as well as the NRHP-eligible structure and cultural landscape, as it will completely remove the Mission 66-era exhibit from its location of over 60 years. The construction of a new exhibit will result in a short-term adverse impact during the construction process itself, due to the use of scaffolding, heavy machinery, and barriers, which will introduce modern, but temporary, visual distractions that interfere with the cultural landscape. It will also have a long-term adverse impact on the cultural landscape associated with the Mission 66 Memorial master plan as a result of alterations to the setting of the visitor center and exhibit, circulation and visitor progression through the site, and the relationship between the exhibit and both the St. Johns River and the visitor center.

While the selected alternative will result in an adverse effect to historic properties under section 106 of the NHPA (36 CFR 800.5), this finding does not equate to a significant impact under NEPA. As analyzed in the EA, the effects to cultural resources are limited in context and

intensity. The action will not diminish the overall integrity of the NRHP-listed historic district, as the broader cultural landscape—including natural landforms, shoreline relationships, and commemorative framework—would remain intact and continue to convey the site’s significance. The impact is confined to the relocation of a single Mission 66-era contributing feature and associated landscape relationships rather than a widespread or systemic alteration of the district.

Measures incorporated into the selected alternative and implementation of the measures identified in the MOA with the Florida state historic preservation office will reduce the severity of impacts on cultural resources. These include salvage and reuse of character-defining features such as the arched entry gate, incorporation of interpretive elements and waysides documenting the Mission 66-era exhibit, and design of the new exhibit to accurately convey the scale and context of the original Fort Caroline while clearly differentiating it from a historic reconstruction. Together, these measures ensure that key aspects of the site’s commemorative and interpretive functions are retained and enhanced.

When the impacts of the proposed action are combined with the effects of reasonably foreseeable actions, like the riprap replacement at the adjacent pier, there will be long-term adverse impacts on the NRHP-listed historic district, as well as the NRHP-eligible structure and cultural landscape, as the Mission 66-era exhibit will be completely removed from its location of over 60 years. The construction of a new exhibit would result in a short-term adverse impact during the construction process itself as mentioned above. However, the proposed action is not considered to have a significant adverse effect on cultural resources due to the mitigating factors of the new exhibit. This includes maintaining the fundamental resources and values of the preserve and the purpose of Fort Caroline National Memorial to commemorate the French settlers who attempted to found a colony in Florida in the 1560s. The new fort exhibit will better demonstrate the original Fort Caroline’s dimensions, leading to new opportunities for interpretation. In addition, key elements of the exhibit will be replicated at its new location, including continued connection to and views of the St. Johns River, use of names of French settlers, and reuse of the arched entry gate from the existing exhibit. Although adverse effects to specific contributing elements will occur, these effects will not collectively rise to the level of significance because they do not substantially alter the overall integrity, function, or interpretive value of the historic district or cultural landscape.

Visitor Use and Experience

Under the selected alternative, construction-related impacts would temporarily limit and disrupt visitor experience. The National Park Service will aim to maintain the existing exhibit during construction of the new exhibit for continued access and visitor experience. The existing exhibit will be demolished after the new exhibit is built. Demolition will include removing the existing structures, filling the moat, and regrading the landscape to a naturally low-lying elevation. The riprap along the shoreline will remain. Access to the existing exhibit will depend on closures for flooding and maintenance activities.

The new exhibit location is heavily forested, which will visually screen construction from direct views from the visitor center, though it will be visible from parts of the trail and pier. The Timucuan Village exhibit will be removed prior to construction of the new exhibit; this will have

short-term and long-term adverse impacts on visitor use and experience, as that educational opportunity will no longer be available. The National Park Service will continue to consult with federally recognized tribes with connections to the site, including the Seminole Tribe of Florida, Thlopthlocco Tribal Town, Miccosukee Tribe of Indians, Seminole Nation of Oklahoma, Muscogee Creek Nation, Poarch Band of Creek Indians, and Alabama-Quassarte Tribal Town, to reenvision educational opportunities to share Native American history of the site. This thoughtful process will have a long-term beneficial impact on visitor use and experience of new interpretation of Native American history and culture.

If issues with staging and construction dictate that the demolition of the existing exhibit must be undertaken prior to the construction of the new exhibit, the National Park Service estimates the public will be unable to experience the exhibit for about six months until the new exhibit is constructed.

Visitor access to or through active construction areas and staging and travel areas will be temporarily restricted. The construction zone for the proposed new exhibit site is near the visitor center, nature trails, and pier; construction operations may result in temporary closures of certain trails or access points but are not expected to result in full closures to these features. The presence of heavy machinery, construction vehicles, and workers could create substantial noise and visual disturbances in the area. Visitors who come to experience the memorial's historic and serene environment could find the disruption unpleasant. Access to the visitor center may be occasionally impacted by construction equipment.

In addition to the aesthetic impact, noise and vibration from construction activities will disrupt the peaceful atmosphere that visitors expect when touring a historic and ecological site. The presence of loud machinery and construction vehicles could interfere with audio tours, guided programs, and self-guided tours, making it difficult for visitors to concentrate or fully appreciate the preserve's educational offerings. If visiting during construction, first-time visitors' experience could degrade their overall impression of the preserve.

Relocating the exhibit will improve visitor safety by moving visitors away from St. Johns River. The memorial is situated adjacent to the river, and, without adequate protection, the increasing frequency of severe storms and rising tides poses a growing risk to the safety of visitors and the physical structure of the exhibit. With the relocation, visitors will be able to visit the new exhibit safely without concern for potential flooding or damage during adverse weather conditions. Increased visitation is expected, as the new exhibit will be a novel space for the public to explore. For those visitors still hoping to access the river at the old exhibit site, access will remain open. The National Park Service may continue to use the old exhibit site along the St. Johns River for other interpretive and educational opportunities.

Another potential issue is visitors' perception of the site's historical integrity. The new exhibit will make it obvious that the memorial is an interpretative feature and not an actual fort reconstruction, and there may be an adjustment period in visitor understanding of the memorial's intent, muddled by the existing fort exhibit's literality. By regulation, properties that are eligible for the NRHP for commemorative reasons must be 50 years old to be considered. The existing exhibit, as a cultural expression of the date of its creation and having reached that age, contributes to the entire memorial's historic significance under NRHP criteria

consideration F (commemoration); a relocated exhibit inherently will not. Visitors who value the existing exhibit's historic appearance may be concerned about the impact of the new exhibit on the site's visual landscape.

During removal of the existing exhibit and construction of the new exhibit, there will be short-term adverse impacts on visitor use and experience. Once construction is complete, the preferred alternative will provide long-term beneficial impacts on visitor use and experience, including a new exhibit free from the issues of flooding and subsequent closures and the inclusion of more accessible trails.

When the impacts of the preferred alternative are combined with reasonably foreseeable actions, including ongoing maintenance activities to the new exhibit and riprap replacement at the pier, the overall occurrences of site closures will be reduced, which will have a long-term beneficial impact on visitor use and experience. The replenishment of the pier riprap will add to the amount of time the public may experience disruptions to the area during construction of the riprap, removal of the existing exhibit, and the construction of the new exhibit. However, construction activities will have a short-term adverse impact on visitor use and experience and will cease after construction.

Vegetation

Under the selected alternative, impacts on vegetation include selected tree removal and clearing of underbrush and invasive species for construction of the new exhibit and accessible pedestrian walkways. In total, 15 trees are proposed to be removed—14 live oaks and 1 laurel oak, ranging from 12 to 30 inches in diameter at breast height. The majority of the trees on the site will be protected during construction and will remain. Decisions for selective removal will be based on construction needs, management issues, general health of each tree, visitor access, and preservation of visitor views of the St. Johns River.

Underbrush (0.9 acres) within the proposed exhibit will be removed, and low grass/vegetation will be maintained through routine mowing. Native scrub (0.08 acres) will be reestablished after construction around exterior sections of the exhibit. Selective underbrush removal (1.4 acres) will occur and will include removal of larger underbrush to open up views of the St. Johns River to the north of the exhibit. Tree and stump removal techniques will be used to minimize ground disturbance and protect surrounding vegetation. Alignments of pedestrian walks will be verified in the field before construction to ensure minimal removal of trees and protection of trees adjacent to new construction. Construction methods and materials for boardwalks within heavily vegetated areas will be detailed within construction drawings and specifications. Limbing-up of selected trees will occur. Additional mitigation measures can be found in chapter 2 of the EA and attachment B of this document.

Permanent loss of maritime hammock vegetation will be minimal (2.3 acres) compared to the extent of maritime hammock vegetation the preserve protects (over 3,500 acres). Therefore, impacts on vegetation will be negligible within the context of the vegetation resources of the Preserve.

Degree to Which the Selected Alternative Affects Public Health and Safety

The selected alternative considers public health and safety during project implementation. The project's purpose and need is to provide a safer experience for the public and is the reason the current exhibit is being moved upland and out of the floodplain. The selected alternative includes fencing and area closures as needed to maintain public safety throughout construction.

Economic Effects

Implementation of the selected alternative will not change visitation overall and will not have economic effects on the local or regional area.

Effects on the Quality of Life of the American People

Implementation of the selected alternative will not meaningfully affect the quality of life of the American people. Although some areas of the park may have temporary closures during construction, the preserve will continue to be accessible by the American people throughout construction. Moving the fort exhibit upland will not have effects on the quality of life of the American people and will not affect emergency services, public water supply, transportation, education, social services, public education, or interpretation at the preserve.

PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

Civic Engagement

The National Park Service introduced and invited the public to comment on the proposed project in July and August 2025. The National Park Service distributed an informational newsletter that was posted on July 9, 2025, on the NPS Planning, Environment, and Public Comment (PEPC) website and on social media. The newsletter included information on the background, purpose of and need for action, process for developing the project, and how to comment. The civic engagement newsletter and news release were sent by email to project stakeholders on July 9, 2025. The news release was also posted to the preserve's website and informed the public of the project, the civic engagement meeting, and the opportunity to provide comments. The National Park Service held a meeting at the Gulliford Community Center on July 23, 2025, from 6:00 to 8:00 pm; interested parties could also attend the first part of this meeting virtually. The 30-day comment period was open from July 9 through August 8, 2025. The National Park Service received 12 individual correspondences, which were split in expressing a desire to maintain the exhibit in its current location and favoring the proposed project to relocate the fort exhibit.

Public Review

The EA went out for formal public and agency reviews for 30 days March 2 to April 1, 2026. Notice of the review and EA was distributed to a variety of interested individuals, agencies, Tribal Nations, and organizations. It was made available on the NPS's PEPC website at: <https://parkplanning.nps.gov/FortCarolineRelocation>.

The National Park Service received 17 pieces of correspondence during the public comment period. Substantive comments and NPS responses can be found in attachment A. No changes to the EA were necessary.

Agency Consultation

National Historic Preservation Act Section 106 Consultation

Florida Division of Historical Resources

As required by section 106 of the NHPA, the National Park Service initiated consultation with the Florida Division of Historical Resources (FDHR) on November 7, 2024, by introducing the proposed project to relocate Fort Caroline National Memorial's fort exhibit and providing a draft report of a phase I archeological survey of the proposed relocation site. FDHR responded on December 5, 2024, by requesting additional information on the current archeological survey and previous work performed within the area of potential effects.

In addition to formal consultation, preserve staff presented the proposed project and consulted with Kelly Chase, Deputy State Historic Preservation Officer, at biennial meetings on June 7, 2023, and May 7, 2025. On each occasion, Kelly Chase agreed that removal of the existing exhibit would constitute an adverse effect according to 36 CFR 800.5 and discussed potential mitigations.

An MOA was signed between the FDHR and the National Park Service on April 20, 2026. The MOA includes the proposed action, area of potential effects, adverse effect determination, and stipulations for mitigation. The MOA can be found in attachment D of this document.

Advisory Council on Historic Preservation

The National Park Service notified the Advisory Council on Historic Preservation on March 26, 2026, of the proposed project, the adverse effect, and ongoing consultation with FDHR. On April 9, 2026, the National Park Service received correspondence from the advisory council that they had chosen not to participate in further consultation.

Tribes

The National Park Service sent a letter initiating consultation to the following five federally recognized Tribal Nations between October 17 and 23, 2025: Miccosukee Tribe of Indians of Florida, Muscogee (Creek) Nation, Seminole Nation of Oklahoma, Seminole Tribe of Florida, and Thlopthlocco Tribal Town. The letter introduced the proposed project to relocate the exhibit. Recipients were sent further materials including the draft plan of action, schematic designs, and letters initiating consultation on February 6, 2026.

The National Park Service consulted with the Miccosukee Tribe of Indians of Florida, Muscogee (Creek) Nation, Seminole Nation of Oklahoma, Seminole Tribe of Florida, Poarch Band of Creek Indians, Alabama-Quassarte Tribal Town, and Thlopthlocco Tribal Town to develop a Native American Graves Protection and Repatriation Act (NAGPRA) plan of action, which describes the procedures for the treatment and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony that may be

discovered during the project. The plan of action was developed in accordance with NAGPRA (25 USC 3001 et seq.), its implementing regulations (43 CFR 10, specifically §10.5[e]), and the Archeological Resources Protection Act (16 USC 470 et seq.), with its implementing regulations (43 CFR Part 7). The National Park Service received a letter from the Seminole Tribe of Florida Tribal Historic Preservation Office approving the plan of action on March 5, 2026, and the National Park Service signed the plan of action on the same day.

Endangered Species Act Section 7

Section 7 of the Endangered Species Act requires federal agencies to ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat. On September 9, 2025, the National Park Service completed the US Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) digital tool that helps project proponents assess and avoid impacts on federally listed species (USFWS 2025a). The IPaC tool identified listed species and critical habitat expected to be in or near the project area under the jurisdiction of the USFWS (terrestrial and freshwater species) and in accordance with the Endangered Species Act. The list included nine species, eight of which may be present at or near the proposed fort exhibit location. The West Indian manatee (*Trichechus manatus*) has been dismissed from further consideration, as no in-water work would occur that would have potential impacts on it. Through the IPaC evaluation process, the tricolored bat (*Perimyotis subflavus*) was determined to be a “may effect, not likely to adversely effect,” and the eastern black rail (*Laterallus jamaicensis* ssp. *jamaicensis*), red-cockaded woodpecker (*Dryobates borealis*), Rufa red knot (*Calidris canutus rufa*), whooping crane (*Grus americana*), wood stork (*Mycteria americana*), eastern indigo snake (*Drymarchon couperi*), and monarch butterfly (*Danaus plexippus*) were determined to be “no effect.” More information on each species and their determinations can be found in appendix A of the EA.

FINDING OF NO SIGNIFICANT IMPACT

As described in chapter 3 of the EA (pages 18–27), the selected alternative has the potential for adverse impacts on cultural resources, visitor use and experience, and vegetation as a result of activities related to relocation of the exhibit. However, no potential for significant adverse impacts were identified. The National Park Service has determined that the selected alternative can be implemented without significant adverse impacts.

CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an EIS. The selected alternative will not have a significant effect on the human environment, in accordance with NEPA section 102(2)(c).

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

The following attachments are included:

- Attachment A: Response to Substantive Public Comments and NPS Responses
- Attachment B: Mitigation Measures
- Attachment C: Nonimpairment Determination
- Attachment D: Memorandum of Agreement

ATTACHMENT A: RESPONSE TO SUBSTANTIVE PUBLIC COMMENTS AND NPS RESPONSES

The Fort Caroline National Memorial Relocation Environmental Assessment (EA) for Timucuan Ecological and Historic Preserve was available for public review and comment between March 2 and April 1, 2026. The National Park Service (NPS) received 17 pieces of correspondence during the public review period. All comments were read and analyzed to identify substantive comments. A substantive comment is a comment that does one or more of the following:

- question, with reasonable basis, the accuracy of information in the NEPA document
- question, with reasonable basis, the adequacy of the environmental analysis
- present reasonable alternatives other than those presented in the NEPA document
- cause changes or revisions in the proposal

In other words, substantive comments raise, debate, or question a point of fact or analysis. Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive and do not require a formal response. The following text summarizes the substantive comments received during the comment period and is organized into concern statements and responses.

Suggestions for Project Implementation

1. **Concern Statement:** The National Park Service should consider moving the exhibit to other possible locations outside of the NPS site, including locally or to another state, as the actual location of the historic fort is unknown.

Bureau Response: The proposed exhibit location is situated within NPS boundaries where Congress designated the Fort Caroline National Memorial. As such, maintaining a memorial exhibit within the established park site is imperative to the enabling legislation that created the memorial. In addition, the Fort Caroline National Memorial has existing support services for the public that complement the memorial exhibit to meet the needs of the visiting public and staff, such as the Timucuan Preserve Visitor Center, restrooms, trails, and other educational exhibits. Moving the memorial exhibit to another location outside of the Fort Caroline National Memorial, whether locally or out of state, is not a feasible option for the National Park Service. There is no funding or support for removing the fundamental resource and value out of the Fort Caroline National Memorial, and no discernable beneficial impacts on resources would occur by the removal of the exhibit off NPS property, as removing the exhibit from NPS property would result in additional adverse impacts on the cultural resources listed on the National Register of Historic Places.

2. **Concern Statement:** The National Park Service should have a plan to replace the Timucuan Village before it is removed.

Bureau Response: As part of the proposed action, Tribal consultations were initiated; interested parties are aware of the removal of the Timucuan Village. Further work to

interpret and educate the public about the Timucuan and other Native peoples will be developed with local Tribes. The National Park Service wants to ensure new exhibits related to local Tribes are developed thoughtfully with Tribal partners and given the amount of time needed for successful educational exhibits to be produced. As such, the process will overlap and surpass the construction of the new memorial exhibit.

3. **Concern Statement:** The National Park Service should limit vegetation removal to create views of the river from the proposed location.

Bureau Response: Maintaining views of the St. Johns River is a key objective of the project (see chapter 1 of the EA), as the exhibit is meant to reflect the importance of Fort Caroline's historical connection to the river. Vegetation impacts were analyzed in EA "Chapter 3: Affected Environment and Environmental Consequences," which includes information on the habitat types that would be impacted (2.3 acres of maritime hammock) compared to the habitat available throughout the preserve (3,500 acres of maritime hammock), resulting in negligible impacts on vegetation habitats available within the preserve.

Additionally, the salt marsh estuaries of the Saint John's River are listed as a fundamental resource and value in the foundational document of the Timucuan Ecological and Historic Preserve. Management and interpretation of this habitat and other ecosystems within the preserve are a core feature of the preserve's purpose, supporting the removal of vegetation at the new exhibit location to continue to interpret the significance the fort had while situated next to the river. The vegetation proposed to be removed from the new exhibit site and the vegetation that will naturally revegetate at the old exhibit location aligns with preserve management priorities.

4. **Concern Statement:** Removal of the existing fort would impact the National Register of Historic Places historic district.

Bureau Response: The historic district and other culturally significant elements listed in the National Register of Historic Places were analyzed in detail in the EA. The analysis can be found in EA "Chapter 3: Affected Environment and Environmental Consequences," which includes background context of the historic districts, historic buildings and structures, cultural landscape, and archeological resources, and describes impacts on cultural resources. Details on the consultation with the Florida Division of Historical Resources and the Advisory Council on Historic Preservation can be found in EA chapter 4 under "Agency Consultation." Furthermore, the memorandum of agreement signed by the National Park Service and Florida Division of Historical Resources, which further documents cultural resource impacts, can be found in attachment D of this FONSI document.

ATTACHMENT B: MITIGATION MEASURES

To minimize resource impacts related to alternative B (the preferred alternative), the project would implement mitigation measures and best management practices whenever feasible. These protection measures are considered part of the action alternative, and they will be implemented to avoid or reduce impacts on preserve resources and values. Subject to the final design and approval of plans by relevant agencies, resource protection measures will include, but will not be limited to, the following items.

- All permits will be acquired from the applicable regulatory agencies before commencement of work, and all stipulations of those permits will be followed.
- Resource protection measures will be clearly stated in the construction specifications, and workers will be instructed to avoid conducting activities outside the project area. Areas of natural or cultural resource concern will be clearly indicated on construction drawings.
- Construction zones will be identified and fenced with construction fencing or similar material before any construction activity. The fencing will define the construction zone and confine activity to the minimum area required for construction. The fencing and signs will also exclude visitors from construction areas for safety reasons. Visitors will be informed about the project through signage, brochures, and the preserve's website.
- Construction activities will be planned to minimize the closure of key areas, such as trails and the riverfront, for extended periods.
- A preconstruction meeting will be held to inform contractors about sensitive areas and resources and will provide procedures for identifying and addressing any unanticipated discoveries.
- Designated staging and storage areas for construction vehicles, equipment, materials, and soils will be sited in previously disturbed or paved areas approved by the preserve. These areas will be clearly identified in advance of construction.
- Construction will only occur during daylight hours to reduce light pollution, avoid nighttime noise disruption, and minimize disturbance to wildlife.
- Some construction activities, such as material delivery, will be scheduled to take place during off-peak hours or during times of lower visitation to reduce the impact on visitors. Noisy or intrusive activities will be limited to hours when fewer visitors are on-site, such as early morning or late afternoon.
- Standard noise abatement measures will be followed during construction. Plans will include a schedule to minimize impacts on adjacent noise-sensitive resources, incorporate the use of best available noise control techniques wherever feasible, require the use of hydraulically or electrically powered tools when feasible, specify properly maintaining construction equipment to minimize noise, and require turning off any idling equipment when not in use.

- The contractor will be required to keep all waste and contaminants contained and remove them daily from the work site.
- To minimize the risk of invasive species being introduced or spread, all construction vehicles will be washed and inspected before use in the project area.
- If previously unknown cultural resources are discovered during project implementation, all work in that area must stop and the Preserve Superintendent, Chief of Science and Resource Management, and/or Preserve Archeologist must be notified immediately in accordance with the 2008 National Park Service Programmatic Agreement, section VI.
- In ongoing consultation with federally recognized Tribes, the National Park Service developed a Native American Graves Protection and Repatriation Act (NAGPRA) plan of action, including an inadvertent discovery plan, specifically for this project. All activity must cease in the area of discovery and immediate notice made to the Superintendent and Chief of Science and Resource Management if items protected by NAGPRA are discovered during project implementation (see chapter 4 of the EA and this FONSI document's section "Agency Consultation").
- An archeological monitor may be required for any work near archeological and prehistoric/historic resources. The archeological monitor will observe and stop work if previously unknown archeological resources are discovered during construction activities.
- A construction spill prevention, control, and countermeasures plan will be developed and implemented.
- Tree and stump removal techniques that minimize ground disturbance will be used to protect surrounding vegetation.
- Tree protection measures such as fencing and root protection will be included in construction activities, such as fencing and root protection, as needed.
- Standard erosion control methods will be employed to limit erosion during and after construction, like erosion socks and/or straw bales at both the existing and proposed exhibit locations.
- Conservation measures related to federally listed species will be adhered to as applicable, including time-of-year restrictions for tree and vegetation removals, time-of-day work hours to limit disturbances to species, and biological monitors, as needed.

ATTACHMENT C: NONIMPAIRMENT DETERMINATION

The National Park Service (NPS) *Management Policies 2006* requires analysis of potential effects to determine whether or not actions will impair park resources. In order to manage and preserve national park lands, Congress passed the NPS Organic Act in 1916. The fundamental purpose of the national park system, established by the Organic Act, begins with a mandate to conserve park resources and values. The Organic Act established the National Park Service as an agency under the discretion of the Secretary of the Interior with the stated purpose of promoting use of national park lands while protecting them from impairment. Sections 1.4.5 and 1.4.6 of the NPS *Management Policies 2006* provide an explanation of impairment as “an impact, that in the professional judgement of the responsible NPS manager, would harm the integrity of park resources and values, including the opportunities that otherwise would be present for the enjoyment of those resources and values.” As stated in section 1.4.5, an impact on any park resource or value may, but does not necessarily, constitute an impairment. An impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; or
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park’s general management plan or other relevant NPS planning documents as being of significance.

An impact will be less likely to constitute an impairment if it is an unavoidable result of an action necessary to pursue or restore the integrity of park resources or values and it cannot be further mitigated. Section 1.4.6 of NPS *Management Policies 2006* identifies the park resources and values that are subject to the no-impairment standard:

- the park’s scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park’s role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and

- any additional attributes encompassed by the specific values and purposes for which the park was established.

Nonimpairment Determination for the Selected Alternative

This determination of nonimpairment has been prepared for the NPS selected alternative, alternative B, described in the finding of no significant impact (FONSI) and in the Fort Caroline Memorial Relocation Environmental Assessment (EA). For the selected action, a determination of nonimpairment is typically made for each of the impact topics carried forward for detailed analysis in the EA. However, the impairment determination does not include a discussion of impacts on visitor use and experience. Visitor use and experience is not considered a park resource or value subject to the nonimpairment standard. Therefore, impairment determinations were made for cultural resources and vegetation. Unacceptable impacts were also considered but will not occur. Impacts on these resources will be reduced to the extent possible through resource protection measures (chapter 2 of the EA, attachment B of the FONSI). Each resource or value for which impairment is assessed and the reasons why impairment will not occur are described below.

Cultural Resources

Removal of the existing fort exhibit will have long-term adverse impacts on the National Register of Historic Places (NRHP)-listed historic district, as well as the NRHP-eligible structure (the existing exhibit). The construction of a new exhibit will result in a short-term adverse impact during the construction process itself, due to the use of scaffolding, heavy machinery, and barriers, which will introduce modern but temporary visual distractions that interfere with the cultural landscape. It will also have a long-term adverse impact on the cultural landscape associated with the Mission 66 Memorial master plan as a result of alterations to the setting of the visitor center and exhibit, circulation and visitor progression through the site, and the relationship between the exhibit and both the St. Johns River and the visitor center.

However, the proposed action is not considered to result in impairment to cultural resources due to the mitigating factors of the new exhibit. This includes maintaining the fundamental resources and values of Timucuan Ecological and Historic Preserve and the purpose of Fort Caroline National Memorial to commemorate the French settlers who attempted to found a colony in Florida in the 1560s. The new exhibit will better demonstrate the original Fort Caroline's dimensions, leading to new opportunities for interpretation. In addition, key elements of the fort exhibit will be replicated at the new fort exhibit location, like the accurate dimensions of the original fort, continued connection and views to the St. Johns River, use of the names of the French settlers, and reuse of the arched entry gate from the existing fort exhibit. Although the selected action will have an adverse effect on the historic district, the selected action will not result in impairment to cultural resources.

Vegetation

Vegetation will be impacted at the new exhibit and will include selected tree removal, clearing of underbrush and invasive species for construction of the new exhibit, and accessible pedestrian walkways. The majority of the trees on the site will be protected during construction and will remain. Decisions for selective removal will be based on construction needs, management

issues, general health of each tree, visitor access, and preservation of visitor views of the St. Johns River.

At the existing fort exhibit location, native vegetation will be encouraged to reestablish naturally in the area once the exhibit is removed. The area is a low-lying area with adjacent saltmarsh that is expected to migrate to the site over time. This will be a benefit to the vegetation and natural resources of the preserve.

Although there will be a permanent loss of maritime hammock vegetation due to the construction of the new exhibit, the impacts will be minimal (2.3 acres) compared to the extent of maritime hammock vegetation the preserve protects (over 3,500 acres). Therefore, the impacts on vegetation will be negligible and will not result in impairment within the context of the vegetation resources of the park.

Conclusion

The National Park Service has determined that implementation of the selected alternative will not constitute impairment of the resources or values of the park. The impact analyses summarized above indicate that the selected alternative will not result in impairment to the extent that it affects a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, (2) key to the natural or cultural integrity for the park or to opportunities for enjoyment of the park, or (3) identified in the park's general management plan or other relevant NPS planning documents as being of significance. This conclusion is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the EA, comments provided by the public, and the professional judgement of the decision maker guided by direction of NPS *Management Policies 2006*.

ATTACHMENT D: MEMORANDUM OF AGREEMENT

**MEMORANDUM OF AGREEMENT
BETWEEN THE
NATIONAL PARK SERVICE,
TIMUCUAN ECOLOGICAL AND HISTORIC PRESERVE
AND THE
FLORIDA STATE HISTORIC PRESERVATION OFFICER**

**REGARDING THE FORT CAROLINE NATIONAL MEMORIAL FORT EXHIBIT
RELOCATION,
TIMUCUAN ECOLOGICAL AND HISTORIC PRESERVE,
JACKSONVILLE, FLORIDA**

WHEREAS, the National Park Service (NPS) plans to carry out the Fort Caroline National Memorial Fort Exhibit Relocation (Undertaking) at Timucuan Ecological and Historic Preserve (Preserve), located in Jacksonville, Duval County, Florida, pursuant to the NPS Organic Act (54 U.S.C. § 100101 et seq.) and consistent with the National Environmental Policy Act (42 U.S.C. § 4321 et seq.); and

WHEREAS, the Undertaking consists of the complete removal of the existing fort exhibit structure from its current location along the bank of the St. Johns River and the construction of a new fort exhibit at an upland location near the Preserve's Visitor Center, outside the Federal Emergency Management Agency (FEMA) floodplain, to protect park resources and investments from chronic storm damage and flooding; and

WHEREAS, NPS has defined the Undertaking's Area of Potential Effects (APE) as the existing fort exhibit site, the proposed upland relocation site near the Visitor Center, and the immediately surrounding grounds and landscape features within Fort Caroline National Memorial; and

WHEREAS, Fort Caroline National Memorial is listed in the National Register of Historic Places (NRHP) as a historic district, having been formally nominated and listed in 1975 (NR#75000605). The fort exhibit is a contributing resource to the historic district and is individually significant under NRHP Criteria Consideration F in the area of Commemoration due to its association with the Mission 66 era of National Park Service development; and

WHEREAS, NPS has determined that the Undertaking will have an adverse effect on the Fort Caroline National Memorial Historic District and its contributing fort exhibit structure, which is listed in the National Register of Historic Places, pursuant to 36 CFR § 800.5, as the removal of the fort exhibit will result in the loss of a contributing structure to the historic district and alter the integrity of the Mission 66-era cultural landscape; and

WHEREAS, NPS has consulted with the Florida State Historic Preservation Officer (SHPO), known as the Florida Division of Historical Resources (FDHR), regarding the adverse effects of the Undertaking on historic properties. The Deputy State Historic Preservation Officer, Kelly Chase, has concurred on multiple occasions—including at biennial consultation meetings on June 7, 2023, and May 7, 2025—that the removal of the existing fort exhibit constitutes an adverse effect under 36 CFR § 800.5; and

WHEREAS, NPS has consulted with and is continuing to consult with federally recognized Tribal Nations with ancestral connections to the area, including the Miccosukee Tribe of Indians of Florida, Muscogee (Creek) Nation, Seminole Nation of Oklahoma, Seminole Tribe of Florida, Thlopthlocco Tribal Town, Alabama-Quassarte Tribal Town, and Poarch Band of Creek Indians, regarding the effects of the Undertaking on historic properties; and the Seminole Tribe of Florida responded that they were accepting of the project as presented; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), NPS has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation, and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

NOW, THEREFORE, NPS and the SHPO agree that the Undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the Undertaking on historic properties.

STIPULATIONS

NPS shall ensure that the following measures are carried out:

I. HISTORIC AMERICAN BUILDINGS SURVEY (HABS) DOCUMENTATION

Prior to the commencement of any demolition, removal, or ground-disturbing construction activities associated with the Undertaking, NPS shall complete Historic American Buildings Survey (HABS) Level I documentation of the existing fort exhibit in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation. The documentation shall include:

A. Measured Drawings

NPS shall prepare a full set of measured drawings depicting the existing conditions of the fort exhibit, including plans, elevations, sections, and significant details, prepared in accordance with HABS standards and specifications.

B. Large-Format Photography

NPS shall produce large-format photographic documentation of the fort exhibit, including exterior elevations, interior spaces, character-defining features, and contextual views of the structure within the cultural landscape along the St. Johns River. All photographs shall be produced in accordance with HABS photographic standards and in compliance with the U.S. Copyright Act, as amended.

C. Written Historical Report

NPS shall prepare a written data package in outline-format historical report style, documenting the history of the fort exhibit including: (1) the original design and construction history of the fort exhibit in the context of the NPS Mission 66 program; (2) a description of modifications and alterations made to the structure over time; (3) a physical description of the structure as it currently exists; and (4) the significance of the fort exhibit as a contributing resource to the Fort Caroline National Memorial Historic District and as a representative of Mission 66-era commemorative design philosophy.

D. Transmittal to the Library of Congress

Upon completion and review, NPS shall transmit all HABS documentation—measured drawings, photographic materials, and written historical report—to the Historic American Buildings Survey/Historic American Engineering Record/Historic American Landscapes Survey (HABS/HAER/HALS) collections at the Library of Congress in accordance with current transmittal standards. NPS shall provide evidence of transmittal acceptance to the SHPO within sixty (60) days of receipt.

E. Review and Consultation

NPS shall provide draft HABS documentation to the SHPO for review and comment no less than thirty (30) days prior to finalization and transmittal to the Library of Congress. The SHPO shall provide comments within thirty (30) days of receipt. NPS shall consider and address SHPO comments prior to finalizing and transmitting documentation.

II. NATIONAL REGISTER OF HISTORIC PLACES NOMINATION UPDATE

Within three (3) years of execution of this MOA, NPS shall prepare and submit a substantive amendment to the NRHP Registration Form (NPS Form 10-900) for the Fort Caroline National Memorial Historic District, consistent with the recommendation of the SHPO. The amended nomination shall include, at minimum:

- (a) Updated documentation and description of the fort exhibit, including its history, design origins, modifications over time, and current conditions;
- (b) A revised Statement of Significance that addresses Commemoration under Criteria Consideration F and Education, as well as Mission 66 context under Criterion A;
- (c) Updated Contributing and Non-Contributing Resources section reflecting any changes to contributing structures resulting from the Undertaking; and
- (d) A revised Period of Significance, as appropriate, to reflect the Mission 66-era context documented in the 2024-2025 Cultural Landscape Report.

NPS shall provide a draft amended nomination to the SHPO for review and comment prior to formal submission.

III. POST-REVIEW DISCOVERIES

If properties are discovered that may be historically significant or if unanticipated effects on historic properties are found during the course of the Undertaking, NPS shall immediately halt all ground-disturbing activities in the vicinity of the discovery and shall:

- (a) Notify the SHPO and, as applicable, Tribal Nations within forty-eight (48) hours of the discovery;
- (b) Assess the nature and significance of the discovery in consultation with the SHPO and other consulting parties, as appropriate; and
- (c) Implement treatment measures agreed upon through consultation prior to resuming work in the affected area.

Nothing in this stipulation shall be construed to limit NPS's obligations under the Native American Graves Protection and Repatriation Act (25 U.S.C. § 3001 et seq.) or the Archaeological Resources Protection Act (16 U.S.C. § 470 et seq.). The Seminole Tribe of Florida has approved the Draft Plan of Action provided to them for this Undertaking.

IV. DURATION

This MOA will expire if its terms are not carried out within five (5) years from the date of its execution. Prior to such time, NPS may consult with the SHPO to reconsider the terms of this MOA and amend it in accordance with Stipulation VII below.

V. MONITORING AND REPORTING

Annually following the execution of this MOA until it expires or is terminated, NPS shall provide the SHPO a summary report detailing work undertaken pursuant to the terms of this MOA. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes or objections received in NPS's efforts to carry out the terms of this MOA.

VI. DISPUTE RESOLUTION

Should any signatory to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, NPS shall consult with such party to resolve the objection. If NPS determines that such objection cannot be resolved, NPS will:

A. Forward all documentation relevant to the dispute, including NPS's proposed resolution, to the ACHP. The ACHP shall provide NPS with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, NPS shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and signatories, and provide them with a copy of this written response. NPS will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, NPS may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, NPS shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories to the MOA, and provide them and the ACHP with a copy of such written response.

C. NPS's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

VII. AMENDMENTS

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

VIII. TERMINATION

If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per

Stipulation VII above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, and prior to work continuing on the Undertaking, NPS must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. NPS shall notify the signatories as to the course of action it will pursue.

Execution of this MOA by NPS and the SHPO and implementation of its terms evidence that NPS has taken into account the effects of this Undertaking on historic properties and afforded the ACHP an opportunity to comment.

SIGNATORIES:

NATIONAL PARK SERVICE, TIMUCUAN ECOLOGICAL AND HISTORIC PRESERVE

 Acting Superintendent 9/20/26

Signature / Date

Chris Hughes, Superintendent
Timucuan Ecological and Historic Preserve

FLORIDA STATE HISTORIC PRESERVATION OFFICER

 4/10/26

Signature / Date

Alissa Slade Lotane, State Historic Preservation Officer
Florida Division of Historical Resources